

# EXHIBIT K



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November 27, 2018

Elizaveta Malashenko  
Director  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Ms. Malashenko:

As required by Resolution ESRB-8, Pacific Gas and Electric Company respectfully submits a compliance report for the potential proactive de-energization for which customers were notified on November 6, 2018. This report has been verified by a PG&E officer in accordance with Rule 1.11 of the Commission's Rules of Practice and Procedure.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meredith E. Allen', is positioned below the 'Sincerely,' text.

Meredith E. Allen  
Senior Director, Regulatory Relations

cc: ESRB\_ComplianceFilings@cpuc.ca.gov

## **PG&E Public Safety Power Shutoff Report to the CPUC**

Events from: 11/6/2018 – 11/8/2018

### **Executive Summary**

PG&E submits the following report to the Director of the Safety and Enforcement Division pursuant to reporting requirements under Resolution ESRB-8 when customers are notified of a possible de-energization event though no de-energization occurred.

Over the course of two days, November 6 and 7, 2018, PG&E informed approximately 70,000 customers in parts of nine counties that the company might need to proactively turn off power for public safety. By the afternoon of November 8, 2018, weather conditions had improved, and PG&E no longer anticipated the need to proactively de-energize.

This report reflects actions taken by PG&E in the interest of public safety and in accordance with California Public Utilities Commission (CPUC) Resolution ESRB-8. As we have expressed previously, turning off power to our customers is a decision that does not come easily, is not made lightly, and will be exercised only as a last resort.

### **Background**

California has experienced dramatic environmental changes in recent years, resulting in record drought, massive tree mortality, record heat waves, and extremely strong wind events. These changes have created a new normal for our state and we must continue to adapt to meet these challenges.

Recognizing that the “2017 California wildfire season was the most destructive wildfire season on record,” the CPUC issued Resolution ESRB-8 in July 2018. The resolution supports the use of de-energization as a “last resort” to mitigate wildfire risks and establishes notification, mitigation, and reporting requirements.

PG&E is working and learning to reflect this new normal in how it adapts, proactively manages risks, plans and invests, and operates to make its systems more resilient. Following the October 2017 wildfires, PG&E implemented the comprehensive Community Wildfire Safety Program (CWSP) as a series of additional safety precautions to help further reduce wildfire risks while providing safe, reliable power to customers. The CWSP includes a range of initiatives designed to further mitigate risk, including turning off the power for safety during extreme weather events. PG&E refers to such events as Public Safety Power Shutoffs (PSPS).

As part of CWSP, PG&E has reached out to more than 570,000 homes and businesses that are served by our electric lines, operating at 70kV and lower, that run through extreme fire-threat areas. We have communicated to these customers through several formats (letter, email, TV and print ads, social media, and news stories) that, if extreme fire danger conditions were forecasted, it might be necessary to temporarily turn off power to their neighborhood or community for safety.

We have also conducted over 450 meetings with local civic and community leaders, first-responder agencies, and other public safety authorities to make them aware of PSPS as an additional safety precaution.

November 6-8, 2018, Potential Public Safety Power Shutoff

No single factor drives a PSPS, but rather PG&E considers numerous criteria when making this decision. Those criteria, broadly speaking, include:

- A Red Flag Warning declared by the National Weather Service
- Low humidity levels, generally 20 percent and below
- Forecasted sustained winds above approximately 25 mph and wind gusts in excess of approximately 45 mph<sup>1</sup>
- Site-specific conditions such as temperature, terrain, and local climate
- Condition of dry fuel on the ground and live vegetation (moisture content)
- On-the-ground, real-time wildfire related information from PG&E's Wildfire Safety Operations Center and field observations from PG&E field crews
  - PG&E's Wildfire Safety Operations Center and the PG&E Meteorology team are constantly monitoring weather conditions on a 24 / 7 basis.

PG&E activated its Emergency Operations Center (EOC), with a designated Officer in Charge (OIC), on November 6, 2018, in response to predicted extreme fire danger and high wind conditions expected on November 8.

The EOC activation was preceded by an extended period of dry fall weather, only one rain event since May, and periods of dry north winds which caused the moisture content of live and dry fuels to remain low across the Tier 2 and Tier 3 High Fire Threat District (HFTD) areas of PG&E's territory.

On Monday morning, November 5, weather models and fire danger models were generally forecasting dry and windy conditions that could lead to extreme fire danger for the period from late Wednesday evening November 7, through Thursday morning, November 8. At that time, overall projections and forecasts, including those from PG&E, did not indicate that conditions would escalate to the point where de-energization for safety was required.

On Tuesday, November 6, 2018, the forecast changed, and PG&E activated its EOC due to forecasted weather conditions with increasing fire risk, including forecasted high winds and extremely low humidity. Teams from all Incident Command Structure (ICS) functions (Planning and Intelligence, Operations, Logistics, Public Information, Customer Strategy, Government Liaison, and others) were assembled to support the potential need for a PSPS.

On that same day, PG&E initiated out-bound communications to approximately 70,000 customers across nine counties where the forecasted weather and wildfire potential indicated a high likelihood of impacts to the company's equipment and facilities. Forecasts of localized extreme weather called for sustained winds of 20 to 30 mph with gusts of 40 to 45 mph. PG&E's customer communications plan included interactive voice response (IVR) telephone messages, emails, texts, news releases, media interviews, social media, and paid advertising. Consistent with its plan, PG&E alerted state agencies (CPUC, Cal OES, Cal Fire and the Governor's Office), local first responders, and community leaders in advance of notifying customers and the public.

On Wednesday, November 7, 2018, PG&E refined the forecasted impact down to 63,000 customers and eight counties (Butte, Lake, Napa, Nevada, Placer, Plumas, Sierra and Yuba). Weather conditions stayed consistent, nearing but not reaching forecasted levels that would warrant temporarily turning off power for customer safety.

<sup>1</sup> PG&E damage prediction model is utilized to understand if winds are expected to produce elevated outage conditions.

By around 13:00 on Thursday, November 8, winds were decreasing, and conditions were no longer forecast to approach PSPS criteria. Based on the forecasted information, PG&E no longer anticipated a possible need to de-energize. PG&E immediately informed all stakeholders of the change in conditions and that no lines would be proactively de-energized.

- **Time, place, and duration of event**

Not applicable. PG&E did not initiate a public safety power shutoff.

- **Customers impacted**

Not applicable. PG&E did not initiate a public safety power shutoff.

- **Damage to overhead facilities in areas where power was shut off**

Not applicable. PG&E did not initiate a public safety power shutoff.

- **Description of customer notice(s)**

- Although PG&E did not proactively shut off power during the potential November 8 PSPS event, notifications were sent to customers in anticipation of the event. Several of the improvements promised after PG&E's first PSPS were implemented during this potential event, including only notifying customers between 08:00 and 21:00 and reducing the number of duplicate notifications.
- Outreach was made via IVR, email, and mobile text messaging. Please see Appendix A for details on messages sent to customers. In summary:
  - The first customer communication prior to potential de-energization (IVR, text, and email) started at approximately 18:30 on November 6, 2018, alerting all potentially impacted customers that PG&E may need to shut-off power for public safety due to weather conditions.
  - The second customer communication targeted all potentially-impacted medical baseline customers prior to de-energization (IVR, text, and email) and started at approximately 08:00 on November 7, 2018, stating that PG&E may need to shut off power for public safety due to weather conditions. The IVR had a prompt-back option to connect with a PG&E customer service representative.
  - The third customer communication prior to potential de-energization (IVR, text, and email) started at approximately 17:00 on November 7, 2018, alerting all potentially impacted customers that PG&E may need to shut-off power for public safety due to weather conditions.
  - Cancellation notifications were sent via IVR to all customers that had received notifications that PG&E may need to shut off power for public safety due to weather conditions, to inform them that they would no longer be subject to de-energization. These notifications were sent in two tranches, with the first starting at approximately 18:30 on November 7, 2018, and the second starting at approximately 14:00 on November 8, 2018.
- Several general customer communications were launched via PG&E's website and via traditional media and social media. The media outreach started on November 6 and continued until November 8, when PG&E informed customers and media that conditions did not warrant initiating a PSPS event.
  - PG&E distributed four news releases during the three-day period. The first three provided information about the potential PSPS as well as the specific geographies involved. The fourth release on November 8, announced that PG&E had determined that it would not proceed with a PSPS event.



- PG&E also sent out 16 Tweets (four on November 6, eleven on November 7, and one on November 8; two in Spanish and Chinese) providing information about the potential PSPS event. PG&E also provided three updates via the PG&E Facebook channel.
- On November 7 and 8, 2018, PG&E representatives went door-to-door and attempted to contact medical baseline customers in all potentially affected areas. These door knocks targeted customers with whom PG&E was unable to confirm successful contact through the process defined below:
  - Successful contact validated through general automated notifications (IVR, text, email)
    1. Customer picked up phone call
    2. Customer prompted back (hits “1”) from text message
    3. Customer opened email
  - If successful contact was not confirmed through general automated notifications, customer service representatives started making live calls continuously to try to contact the customer. Successful contact was validated if the customer picked up the phone call.
  - If the customer did not pick up the phone call, a field employee was deployed to knock on the customer’s door, and if the field employee could not get into the customer’s premise, PG&E continued to make live calls to the customer until the event was cancelled.
- There were three potentially impacted Community Choice Aggregators: Marin Clean Energy, Sonoma Clean Power, and Pioneer Community Energy.
- **Local community representatives contacted prior to de-energization and the date on which they were contacted**

In anticipation of the potential de-energization event, PG&E conducted broad outreach to officials in the possibly impacted communities. See Appendix B for a complete list of community representatives contacted. PG&E deployed an automated notification through the Send Word Now (SWN) platform to pre-identified city and county officials. SWN is a notification platform that can deploy IVR messages, emails, and text messages. To complement the notification routed through SWN, PG&E reached out via live calls to government officials at local, state, and federal levels for this event.
- **Identify each community assistance location available during PSPS event, describe the location (in a building, a trailer, etc.), describe the assistance available at each location, and give the days and hours that it was open**

PG&E is unaware of any community assistance locations set up for the potential PSPS event.

- **Number and nature of complaints received as the result of PSPS event**

PG&E received one CPUC complaint related to the potential PSPS event on November 6-8, 2018<sup>2</sup>, in which the customer expressed general disagreement with the Public Safety Power Shutoff program.

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<sup>2</sup> Based on data available November 16, 2018.

- **Claims filed because of PSPS event**

PG&E has not received any claims related to the potential PSPS event on November 8, 2018<sup>3</sup>.

- **Detailed description of steps taken to restore power**

Not applicable. PG&E did not initiate a public safety power shutoff.

- **Other relevant information to help the Commission's assessment of reasonableness of the decision to de-energize**

Not applicable. PG&E did not initiate a public safety power shutoff.

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<sup>3</sup> Based on data available November 16, 2018.

# **Appendix**



**Appendix A - Communication Dates, Times and Type**Table A-1. Summary of Customer Notifications<sup>4</sup>

<b>Starting Date</b>	<b>Type of Notification</b>	<b>Starting Time</b>	<b>Total # Notifications Sent (at the premise level)</b>
11/6/2018	Pre-event Notification	18:30	62,022
11/7/2018	Pre-event Notification (Medical Baseline only)	8:00	3,568
11/7/2018	Pre-event Notification	17:00	52,312 <sup>5</sup>
11/7/2018	Cancellation Notification (premises no longer impacted)	18:30	3,613
11/8/2018	Cancellation Notification (premises no longer impacted)	14:00	35,952 <sup>6</sup>

<sup>4</sup> This summary includes an aggregation of all notifications sent, including notifications to a premise that had multiple notification contact points and channels (IVR, text, email).

<sup>5</sup> Customers that were going to receive cancellation notifications did not receive this pre-event notification.

<sup>6</sup> Cancellation notifications were not sent to customers with an existing outage.

Table A-2. Notification Scripts

<b>Date and Starting Time of Notification</b>	<b>Pre-event Notification</b>
11/6/2018 (18:30)	<p>"This is an important safety alert from Pacific Gas and Electric Company. Extreme weather conditions and high fire-danger are forecasted in &lt;&lt;COUNTY NAME&gt;&gt; County, starting this &lt;&lt;DAY&gt;&gt; and lasting through &lt;&lt;DAY&gt;&gt;.</p> <p>These conditions may cause power outages in the area of your address starting with &lt;&lt;####&gt;&gt;. To protect public safety, PG&amp;E may also temporarily turn off power in your neighborhood or community. If there is an outage, we will work to restore service as soon as it is safe to do so.</p> <p>Please have your emergency plan ready. If you see a downed power line, assume it is energized and extremely dangerous. Do not touch or try to move it — and keep children and animals away. Report downed power lines immediately by calling 911.</p> <p>For more information on how to prepare, please visit <a href="http://pge.com/wildfiresafety">pge.com/wildfiresafety</a> or call 1-800-PGE-5002. Thank you. Please Press 1 to replay this message."</p>
<b>Date and Starting Time of Notification</b>	<b>Pre-event Notification (Medical Baseline)</b>
11/7/2018 (08:00)	<p>"This is an important safety alert from Pacific Gas and Electric Company. Extreme weather conditions and high fire-danger are forecasted in &lt;&lt;COUNTY NAME&gt;&gt; County, starting this &lt;&lt;DAY&gt;&gt;, &lt;&lt;DATE&gt;&gt; and lasting through &lt;&lt;DAY&gt;&gt;, &lt;&lt;DATE&gt;&gt;.</p> <p>These conditions may cause power outages in the area of your address starting with &lt;&lt;####&gt;&gt;. To protect public safety, PG&amp;E may also temporarily turn off power in your neighborhood or community.</p> <p>Please have your emergency plan ready. If you have a backup generator, please do a safety check and make sure you have enough fuel to last for a few days. Keep emergency numbers on hand, and if possible, consider spending time with a friend or relative during an outage.</p> <p>If you have questions about this outage and want to speak to someone at PG&amp;E, please press 0 "zero" to be connected to a customer service representative.</p> <p>If there is an outage, we will work to restore service as soon as it is safe to do so.</p> <p>For more information on how to prepare, please visit <a href="http://pge.com/wildfiresafety">pge.com/wildfiresafety</a> or call 1-800-PGE-5002. Thank you. Please press 1 to replay this message."</p>
<b>Date and Starting Time of Notification</b>	<b>Pre-event Notification</b>
11/7/2018 (17:00)	<p>"This is an important safety alert from Pacific Gas and Electric Company. Extreme weather conditions and high fire-danger are forecasted in &lt;&lt;COUNTY NAME&gt;&gt; County, starting this &lt;&lt;DAY&gt;&gt; and lasting through &lt;&lt;DAY&gt;&gt;.</p>

	<p>These conditions may cause power outages in the area of your address starting with &lt;&lt;####&gt;&gt;. To protect public safety, PG&amp;E may also temporarily turn off power in your neighborhood or community. If there is an outage, we will work to restore service as soon as it is safe to do so.</p> <p>Please have your emergency plan ready. If you see a downed power line, assume it is energized and extremely dangerous. Do not touch or try to move it — and keep children and animals away. Report downed power lines immediately by calling 911.</p> <p>For more information on how to prepare, please visit <a href="http://pge.com/wildfiresafety">pge.com/wildfiresafety</a> or call 1-800-PGE-5002. Thank you. Please Press 1 to replay this message."</p>
<b>Date and Starting Time of Notification</b>	<b>Cancellation Notice</b>
11/7/2018 (19:00)	<p>"This is an important safety update from Pacific Gas and Electric Company. Weather conditions have improved in your area, and we are not planning to turn off electricity for safety in the area of your address starting with &lt;&lt;####&gt;&gt;. Conditions can change quickly, so please stay prepared with your emergency plan. We are continuing to monitor conditions and will contact you with any further updates.</p> <p>Thank you for your patience. For more information, please visit <a href="http://pge.com/wildfiresafety">pge.com/wildfiresafety</a> or call 1-800-PGE-5002. Please press 1 to replay this message."</p>
<b>Date and Starting Time of Notification</b>	<b>Cancellation Notice</b>
11/8/2018 (14:00)	<p>"This is an important safety update from Pacific Gas and Electric Company. Weather conditions have improved in your area, and we are not planning to turn off electricity for safety in the area of your address starting with &lt;&lt;####&gt;&gt;. Conditions can change quickly, so please stay prepared with your emergency plan. We are continuing to monitor conditions and will contact you with any further updates.</p> <p>Thank you for your patience. For more information, please visit <a href="http://pge.com/wildfiresafety">pge.com/wildfiresafety</a> or call 1-800-PGE-5002. Please press 1 to replay this message."</p>

**Appendix B – List of Community Representatives Contacted**

Liaison Outreach Tracker	10/14 09:00 Community Reps contacted
Members of Congress	Offices of Senators Harris and Feinstein, Representatives LaMalfa, Thompson, McClintock, Huffman and Garamendi
Members of Legislature	Senators: Gaines, Nielsen, Dodd, Berryhill Assembly members: Dahle, Aguiar-Curry, Kiley, Bigelow and Gallagher
Butte County	County CAO Shari McCracken, Sheriff Kory Honea, Public Works Director Dennis Schmidt, Paradise Town Manger Lauren Gill, Paradise Police Chief Eric Reinbold, Superintendent of Schools Tam Taylor
Sierra County	Supervisor Lee Adams, Public Works Director Tim Beals, Public Works Transportation Planner Brian Davey
Lake County	CAO Carol Huchingson, Clearlake City Manager Greg Folsom, Clearlake Policy Chief Adam White, Lakeport Police Chief Brad Rasmussen, CEO Chamber of Commerce Melissa Fulton, County Sheriff Martin, County OES Manager Dale Carnathan, Fire Chief Willie Sapeta, Supervisors Jim Steele, Moke Simon, Rob Brown, and Tina Scott
Napa County	County OES Kerry Whitney, County Supervisors Ryan Gregory, Diane Dillon, Belia Ramos, Alfredo Pedroza, and Brad Wagenknecht City of Calistoga Mayor Chris Canning, Calistoga City Manager Dylan Feik, Calistoga Public Works Director Mike Kirn, County CEO Minh Tran, Saint Helena Public Works Director Erica Ahmann Smithies, County Superintendent Office of Education Barbara Nemko, Saint Helena City Manager Mark Prestwich, Calistoga City Manager Dylan Feik,
Nevada County	Board Chair Ed Scofield, County OES John Gulserian, County CEO Alison Lehman, Deputy County CEO Mali Dyck Grass Valley City Manager Tim Kiser, Grass Valley Mayor Howard Levine, Nevada City City Manager Catrina Olson Nevada City Mayor David Parker
Placer County	Board Chair Jim Holmes, County Executive Officer Todd Leopold, Deputy County CEO Bekki Riggan, Supervisor Jennifer Montgomery, County OES Holly Powers County OES Rod Rodriguez, City of Colfax Mayor Will Stockwin, Colfax City Manager Wes Heathcock, City of Auburn Mayor Bridget Powers, Auburn City Manager Bob Richardson, Auburn Public Works Director Bernie Schroeder, Placer County Sheriff Deputies Shayne Wright, Andrew Scott, and Brian Silva
Plumas County	Supervisor Lori Simpson
Sonoma County	County Emergency Management Neil Bregman, Supervisor Lynda Hopkins, Supervisor James Gore

Yuba County	Board Chair Andy Vasquez, County Supervisor Randy Fletcher, County Administrator Robert Bendorf, County OES Scott Bryan, County OES Brianna Schuette
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**VERIFICATION**

I, undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for that reason.

I have read the foregoing "PG&E Public Safety Power Shutoff Report to the CPUC" for the events of November 6-8, 2018, and I am informed and believe the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California this 27<sup>th</sup> day of November, 2018.



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PATRICK M. HOGAN  
Senior Vice President, Electric Operations  
PACIFIC GAS & ELECTRIC COMPANY